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DEPT. OF TRANSPORTATION

Docket management System(DMS)
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400 Seventh St. SW
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January, 16,2001

Sir,

As an Airframe & Powerplant Mechanic I have been following the proposal regarding LIFE LIMITED PARTS DISPOSITION and have several thoughts.

First: It is quite necessary. The problem of reintroduction of parts beyond their life limit is very serious. My area of employment has been General Aviation, particularly helicopters. While living in Florida I have met several people who brag about "keeping a part on the 'healing shelf'" for a while and then painting it, and reselling it. Sometimes new paperwork is created.

Second: Activities like this are difficult to prove. I have made reports; some of my colleagues have also reported mechanics and operators who do this. Without proof, which is extremely difficult to get, the FAA has been unable to take action.

Third: Any part now "runout" and removed still remains the property of the aircraft owner. Currently a mechanic does not have the legal right to destroy or permanently disable an illegal part. The moral obligation will not prevent a lawsuit by the rightful owner.

Fourth: The regulation should be quite specific in what action is to be taken. I don't believe it can be just paperwork. Without physically rendering the part beyond reuse the new regulation will be circumvented by unscrupulous people.

Sincerely,



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